

### Remarks

1. The Examiner's reconsideration of the application is urged in view of the amendments above and the comments below.

2. Amendments of claims.

In claim 1 it has now been specified that the electronic display system includes a first viewable face and optionally a second viewable face. This amendment is based on the specification page 3, lines 31-32, page 10, lines 26-29 and page 1, lines 31-32.

Independent method claim 12 has been amended in the same way.

Further, in order to make method claim 12 more consistent with system claim 1, the features of claim 1: "and which displayed image is composed by a certain number of pixels" and "whereby the printhead includes a plurality of electrodes arranged in one or more rows, whereby the number of electrodes is lower than said number of pixels" have been introduced in claim 12.

3. Rejections under 35 U.S.C. § 103(a).

Claims 1, 2 and 4 – 12 stand rejected under 35 U.S.C. 103(a) as unpatentable over Eller et al. (U.S. Patent Application No. 2006/0050012) in view of Lacayo et al. (U.S. Patent Application No. 2003/0210240) in further view of Comiskey et al. (US 6,473,072).

Amended claim 1 describes an electronic display system having an electronic display apparatus comprising the following features:

- a. an electronic non-volatile display device for displaying an image composed by a number of pixels;
- b. the display device having the form of an endless loop;
- c. a display driver circuit,
- d. a printhead including a plurality of electrodes arranged in one or more rows and with a number of electrodes lower than the number of pixels;

- e. a storage means for storing at least at least one image;
- f. transferring means for transferring the content of the at least one image from the storage means to the display device, and
- g. a connecting means for connecting the electronic display system to a network central processor
- h. whereby the electronic display system has a first viewable face and optionally a second viewable face.

Features a, b, d and h are not disclosed in Eller et al.

In the Office Action, the Examiner argues on page 3 that: "Lacayo et al. teaches the usage of an electronic display apparatus (204), which comprises an electronic non-volatile display device which is able to retain an image after power is switched off" (corresponding to feature a above).

However, in the reply of April 17, 2007 to the Office Action of January 17, 2007, Applicants did put forward a reasoning showing that the condition for establishing a *prima facie* case of obviousness is not met when combining Eller with Lacayo and that Eller teaches even away from solutions according to Lacayo (see the reply, page 3, the paragraph starting with: "It is the intention of Eller..."). In the Office Action of May 16, 2007, no reaction to this reasoning could be found and the argumentation in the most recent Office Action in favor of the combination of Eller and Lacayo is a simple repetition of the argumentation already given in the Office Action of January 17.

Applicants respectfully maintain their reasoning and conclusion of April 17, 2007 in respect with the combination of Eller and Lacayo and it can thus be concluded that a basic criterion for obviousness is not met.

In the Office Action, the Examiner further argues on page 4 that : "Comiskey et al. teaches a electrophoretic display device, wherein the display device has the form of an endless loop and the displayed image is composed by a certain number of pixels" (corresponding to part of feature a and to feature b above) and "Comiskey et

al. also teaches a printhead system fed by the driver circuit" (corresponding to a part of feature d above).

In the Office Action, it is suggested that the motivation to combine the Comiskey et al. system with the billboard display system of Eller et al. lies in the fact that "the Comiskey et al. system enables the user to change displayed images repeatedly" (see the O.A., page 4, end of first paragraph).

Applicants respectfully disagree with this motivation to combine.

Indeed, the display system according to Eller includes already the possibility for the user to change displayed images repeatedly. Eller mentions explicitly that the electronic billboards, used by the system, "have the capability of displaying still or video images in a manner similar to a television or computer display" (see [0021]). It is well known in the art that images displayed by a television or computer can be changed almost without any limit so that the system according to Eller enables already the user to change displayed images repeatedly.

In the present case, there is thus no motivation to combine the teachings of Eller with the teachings of Comiskey and a basic requirement of obviousness is missing (see MPEP, page 2100-126, paragraph 2143).

For the sake of completeness: even a combination of Lacayo with Comiskey would lack any motivation.

Further, instead, Comiskey discloses a drawing system, as already indicated in the title and the word "display" is used by Comiskey in the sense of a drawing device (see col. 1:12-13, col. 5:17-18 and col. 14:30-41). This is confirmed by the fact that normally, a stylus is used as writing tool.

Nevertheless, Comiskey mentions also the possibility of a printhead, permitting a user to write or to draw (col. 14: 30-32 and 42-44). However, Comiskey does not disclose that this printhead has a plurality of electrodes arranged in one or more rows so that, even supposing that there exists a motivation to combine Eller with Comiskey, feature d above is not disclosed in Comiskey.

Feature h of claim 1 is also not disclosed in Comiskey and is also not disclosed in any other cited reference.

It is therefore submitted that claim 1 is non-obvious over the prior art for the following reasons:

- there is no suggestion or motivation to combine the teachings from Eller et al with the teachings of Lacayo;
- there is no suggestion or motivation to combine the teachings from Eller et al with the teachings of Comiskey;
- limitations d and h of claim 1 are not taught or suggested in any prior art reference
- whereby each of these reasons is sufficient in itself to establish the nonobvious-ness of claim 1.

Method claim 12 being drafted along the lines of system claim 1, the same arguments apply in favor of the novelty and the nonobviousness of claim 12 as the arguments raised in relation with claim 1 above.

Claims 2 and 4-11 are claims depending on claim 1; these claims are thus also submitted to be novel and nonobvious.

#### 4. Further Rejection under 35 U.S.C. § 103(a).

Claim 3 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Eller et al. (U.S.Patent Application No. 2006/0050012) in view of Lacayo et al. (U.S.Patent Application No. 2003/0210240) and Comiskey et al. (US 6,473,072) as applied to claims 1, 2 and 4-12 and further in view of Poliakine (US-PGPUB 2003/0146891).

Claim 3 is a claim dependent on claim 1; claim 3 is thus also submitted to be novel and nonobvious.

6. Conclusion

Given the above, it is submitted that the application is in condition for allowance, and the Examiner's further and favorable reconsideration is urged.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Lee, Jr.", written over a horizontal line.

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